

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

Jared Goyette,
*On behalf of himself and other similarly
situated individuals,*

Court File No. _____

Plaintiff,

v.

City of Minneapolis; Minneapolis Chief
of Police Medaria Arradondo *in his
individual and official capacity;*
Minneapolis Police Lieutenant Robert
Kroll, *in his individual and official
capacity;* Minnesota Department of
Public Safety Commissioner John
Harrington, *in his individual and official
capacity;* Minnesota State Patrol Colonel
Matthew Langer, *in his individual and
official capacity;* and John Does 1-2, *in
their individual and official capacities.*

**PLAINTIFF'S MOTION FOR
CLASS CERTIFICATION**

Defendants.

Plaintiff Jared Goyette, on behalf of himself and a class of individuals similarly situated (“Plaintiff Class”), hereby moves for an order certifying the following class:

All members of the news media, as the term is used in Emergency Executive Order 20-69, who intend to engage in news gathering or reporting activities in Minnesota related to the protest activities that followed the death of George Floyd and the law enforcement response to those protests.

For the reasons set forth the accompanying memorandum of law, all of Rule 23's prerequisites have been satisfied and the motion for class certification should be granted.

Dated: June 2, 2020

/s/ Kevin C. Riach
Kevin C. Riach (#0389277)
Dulce J. Foster (#0285419)
Pari I. McGarraugh (#0395524)
Jacob P. Harris (#0399255)
FREDRIKSON & BYRON, P.A.
200 South Sixth Street, Suite 4000
Minneapolis, MN 55402-1425
Telephone: 612.492.7000
kriach@fredlaw.com
dfoster@fredlaw.com
pmcgarraugh@fredlaw.com
jharris@fredlaw.com

Adam W. Hansen (#0391704)
APOLLO LAW LLC
333 Washington Avenue North, Suite 300
Minneapolis, MN 55401
Telephone: 612.927.2969
adam@apollo-law.com

Teresa Nelson (#269736)
**AMERICAN CIVIL LIBERTIES UNION
OF MINNESOTA**
P.O. Box 14720
Minneapolis, MN 55414
Telephone: 651.529.1692
tnelson@aclu-mn.org

*Attorneys for Plaintiff and the Proposed
Plaintiff Class*